

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

*In re:*

*Application of the Reporters Committee for  
Freedom of the Press for an Order Authorizing  
the Release of Grand Jury Material Cited,  
Quoted, or Referenced in the Report of Special  
Counsel Robert S. Mueller III*

Case: 1:19-mc-00045  
Chief Judge Beryl A. Howell

**MOTION FOR EXTENSION OF TIME  
TO FILE OPPOSITION TO GOVERNMENT’S MOTION TO DISMISS OR DENY**

Pursuant to Federal Rule of Civil Procedure 6(1)(A), the Reporters Committee for Freedom of the Press, applicant in the above-captioned matter, moves to extend the time within which to file its opposition to the Department of Justice’s motion to dismiss or deny its application in the above-captioned action, from August 26, 2019 to September 30, 2019.

On June 13, 2019, this Court directed the parties to submit a request to extend the stay or a proposed briefing schedule by August 12. No briefing schedule has been entered by the Court.

On July 31, 2019, the House Judiciary Committee and the Department of Justice jointly proposed and the Court entered a briefing schedule in *In re: Application of the Committee on the Judiciary, U.S. House of Representatives, for an Order Authorizing the Release of Certain Grand Jury Materials*, No. 1:19-gj-00048-BAH (D.D.C. July 26, 2019), which the House Judiciary Committee properly designated as related to the above-captioned action (the “House Judiciary Matter”). Pursuant to that briefing schedule, the Department of Justice will respond to the House Judiciary Committee’s application by September 13, 2019, and the House Judiciary Committee will reply by September 30. *See* Dkt. 5, *In re: Application of the Committee on the*

*Judiciary, U.S. House of Representatives, for an Order Authorizing the Release of Certain Grand Jury Materials*, No. 1:19-gj-00048-BAH (D.D.C. July 26, 2019).

On August 6, 2019, the Reporters Committee moved to consolidate the above-captioned matter with the House Judiciary Matter. *See* Dkt. 13. In that motion, the Reporters Committee proposed that the parties in the above-captioned action “proceed along the briefing schedule the House Judiciary Committee and the Department of Justice have adopted.” Dkt. 13, at 4.

On August 12, 2019, the Department of Justice opposed the Reporters Committee’s motion for consolidation. The Department of Justice concurrently and preemptively moved to dismiss the Reporters Committee’s application or, in the alternative, to deny the relief sought in that application. *See* Dkt. 15. Under Local Civil Rule 7, the Reporters Committee’s opposition to the Department of Justice’s motion to dismiss would ordinarily be due August 26, 2019.

The Reporters Committee respectfully requests that the briefing schedule for the above-captioned application be aligned with that of the House Judiciary Committee, such that the Reporters Committee’s opposition to the Justice Department’s motion to dismiss be due on September 30, 2019, concurrently with the House Judiciary Committee’s filing of its reply in support of the relief sought by its application.<sup>1</sup> Oral argument has not yet been scheduled on the merits of either application, and aligning the briefing schedules will allow the Court to consider both applications, which present overlapping legal issues, on the merits simultaneously. Extending the time for the Reporters Committee to file an opposition to the Justice Department’s motion to dismiss would also give the Court time to rule on the Reporters Committee’s pending motion to consolidate the two matters before the applications are fully briefed.<sup>2</sup> Accordingly, the

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<sup>1</sup> The government has advised that it intends to oppose this motion for an extension of time.

<sup>2</sup> Even if this Court were not to agree that the two matters should be consolidated and that the briefing schedules should be aligned, the Reporters Committee would nonetheless seek an extension of time to file its opposition for scheduling reasons.

Reporters Committee requests that the Court extend the time to file its brief opposing dismissal of its application to September 30, 2019.

Dated: August 15, 2019

Respectfully submitted,

/s/ THEODORE J. BOUTROUS  
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**[PROPOSED] ORDER**

The motion for an extension of time is hereby **GRANTED**. The Reporters Committee for Freedom of the Press is directed to respond to the government's cross-motion to dismiss or deny the application by September 30, 2019.

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_, 2019.

Dated:

\_\_\_\_\_  
Beryl A. Howell  
United States District Judge